

**BEFORE THE ILLINOIS COMMERCE COMMISSION**

**Docket No. 00-0596**

**Rebuttal Testimony of John J. Muhs  
On Behalf of Ameritech Illinois**

**Ameritech Illinois Exhibit 1.1**

**December 5, 2001**

OFFICIAL FILE

ILL. C. C. D. NO. 00-0596  
Ameritech 1.1  
1-16-02 [Signature]

**INTRODUCTION**

**Q. Please state your name and position.**

A. My name is John J. Muhs. I am currently employed by SBC/Ameritech as General Manager, Ameritech Network Regulatory and Legislative Strategy.

**Q. Have you previously provided previous testimony in this proceeding?**

A. Yes. I submitted direct testimony on behalf of Ameritech Illinois on November 5, 2001.

**Q. Please state the purpose of your rebuttal testimony and provide a brief summary.**

A. The purpose of my testimony is to underscore Ameritech Illinois' general support for Staff's proposed rule, subject to the minor changes mentioned in my initial testimony. I encourage the Commission to reject sweeping changes to the information to be reported by telecommunications carriers, as proposed by the City of Chicago (City) and, to a lesser extent, by the Citizens Utility Board (CUB) and the Attorney General (AG). Those changes, if adopted, would be burdensome, unnecessary or otherwise bad policy from a network planning and operations perspective. Additionally, I will discuss a narrower area of disagreement with CUB/AG regarding the modification of some of the Commission's measures of service quality and the proposed addition of new measures. I will also respond to certain allegations regarding Ameritech Illinois' service quality record and recent employee reductions.

22 **Reporting**

23 **Q. You mentioned that the City has proposed added reporting requirements. Is that**  
24 **proposal consistent with the Commission's basis for opening this proceeding?**  
25

26 **A.** I do not believe it is. Section 13-512 of the PUA, which the Commission relied upon in  
27 initiating this docket, provides:

28 The Commission shall have general rulemaking authority to make rules necessary  
29 to enforce this Article. However, not later than 270 days after the effective date of  
30 the amendatory Act of 1997, and every two years thereafter, the Commission shall  
31 review all rules issued under this Article that apply to the operations or activities  
32 of any telecommunications carrier. The Commission shall, after notice and  
33 hearing, repeal or modify any rule it determines to be no longer in the public  
34 interest as the result of the reasonable availability of competition.  
35

36 I am not an attorney, but Section 13-512 leads me to believe that a Rule like 730 should  
37 be repealed or modified if it is no longer in the public interest "as the result of the  
38 reasonable availability of competition." Section 13-512 does not appear to me to call for  
39 significantly increased regulations.  
40

41 Further, the Commission's order initiating this proceeding does not seem to support a  
42 major expansion of reporting requirements. That order states that this rulemaking was  
43 opened to:

44 determine whether the standards for local exchange telecommunications service  
45 are clear as well as consistently applied and reported by all local exchange  
46 carriers, to determine whether Part 730, as currently written, has sufficient penalty  
47 mechanisms associated with it to modify a local exchange carrier's performance,  
48 to determine whether the levels of service currently required of local exchange  
49 carriers are appropriate, or if more stringent measures should be adopted, and to  
50 revise Part 730 as the Commission determines appropriate on the basis if the  
51 foregoing determinations as well as any other properly raised issues.  
52

53 That paragraph seems to focus on whether the levels of service are appropriate or whether  
54 the measures should be more stringent, not a major expansion of reporting requirements.

Ameritech Illinois agrees with the position of Verizon witness Boswell (pp. 4-5) that the proposed rules, with minor exceptions, are “clear and consistently applied” and that the proposed rules have sufficient penalty mechanisms.

**Q. Do you believe the proposed additional reporting requirements are necessary or appropriate?**

A. No, I do not. The City has not presented any evidence that should lead the Commission to believe that significant changes to Staff’s proposed reporting requirements are necessary. First, I am not aware of any evidence that would support a wide reporting expansion to be applied to the entire industry. Certainly, Mr. Riolo’s testimony contains no such evidence. Second, with respect to Ameritech Illinois’ own service quality performance, I would concede we did have problems with installation and repair in 2000. However, Mr. Riolo’s claim (p. 34) that those problems lasted for over 24 months is simply not true. As Schedule 1 to this testimony shows, those problems lasted less than a year, and Ameritech Illinois’ service quality is currently excellent by any reasonable standard.

More importantly, in the context of the City’s proposal, Ameritech Illinois’ service problems did not occur because reporting was deficient. To the contrary, the Commission, competitors and consumer groups were well aware of Ameritech Illinois’ service problems in 2000. Staff’s proposed rules and supporting testimony, which build on existing rules, indicate that current reporting mechanisms, as modified by Staff’s proposal, will allow the Commission and other parties to monitor service quality issues adequately.

80

81 **Q. Specifically regarding Ameritech Illinois, are other service quality measures in place**  
82 **that would further reduce any need for added reporting requirements?**

83

84 A. Yes. First, the Alternative Regulation Plan, as discussed by Ms. TerKeurst (p. 14),

85 currently provides for downward price cap adjustments if service quality measures are

86 missed. The Commission's review of Ameritech Illinois' Alternative Regulation Plan is

87 currently pending, but the new plan will clearly continue to include substantial service

88 quality provisions. Additionally, Ameritech Illinois is subject to service quality

89 commitments and penalties resulting from the SBC/Ameritech Merger Order. In

90 addition, Ameritech Illinois is motivated by its desire to provide quality service and retain

91 customers in light of the competitive environment.

92

93 **Q. Is the level of detail in the City's proposal appropriate?**

94

95 A. No, it is not. If one objectively examines both the quantity and granularity of the

96 reporting requirements proposed by Mr. Riolo (pp. 13-15), it is clear that the requested

97 data would be extremely voluminous and detailed. Such data could be useful only to the

98 extent it was continuously reviewed by skilled telecommunications experts. Analysis of

99 that sort of data is the job of hundreds of network employees at Ameritech Illinois. To

100 evaluate that type of data, at the level of detail proposed by Mr. Riolo, would effectively

101 require the Commission to replicate Ameritech Illinois' Network decision making

102 process. As a matter of policy, that is a flawed approach. A better policy would be to

103 allow the telecommunications carriers to do their jobs and to let the Commission judge

104 the performance of the carriers.

105

106 **Q. Please explain your objections to the level of detail required by the City's proposal.**

107

108 A. If one assumes that all of the requested data were available, (and in Ameritech Illinois'  
109 case it primarily is not) the quantity of data would be overwhelming. Ameritech has  
110 approximately 280 wire centers and approximately 40 Distribution Allocation Areas  
111 (DAAs) per wire center. The City proposes reporting of 39 new types of data (that is,  
112 new either in definition or level of detail) over approximately 11,200 total DAAs. That  
113 would yield approximately 437,000 monthly data points quarterly, from Ameritech  
114 Illinois alone. In Ameritech Illinois' case, reviewing similar data is the job of  
115 approximately 50 full-time engineers, assisted by complex, specialized software that sifts  
116 through a broad range of network information in advance. I do not believe that the  
117 Commission has the resources required to replicate this process, nor should the  
118 Commission be required to pay consultants to do so. If the Commission were to collect  
119 such an extensive amount of information, it would almost certainly just sit on a shelf, and  
120 the burden on carriers to create the information would be wasted.

121

122 **Q. Is there any other policy reason why the Commission should reject the additional**  
123 **data requested by the City as inappropriate?**

124

125 A. Yes. The General Assembly recently passed HB 2900. Section 13-712 (f) of the new law  
126 provides:

127 The rules shall require each telecommunications carrier to provide to the  
128 Commission, on a quarterly basis, and in the form suitable for posting on the  
129 Commission's website, a public report that includes **performance data** for basic  
130 local exchange service quality of service. The **performance data** shall be  
131 disaggregated for each geographic area and each customer class of the State for  
132 which the telecommunications carrier internally monitored **performance data** as  
133 of a date 120 days preceding the effective date of this amendatory Act of the 92

General Assembly. The report shall include, at a minimum, **performance data** on basic local exchange service installations, lines out of service for more than 24 hours, carrier response to customer calls, trouble reports, and missed repair and installation commitments. (Emphasis added)

Note the Legislature's focus on performance data. It is mentioned four times in the section. Also note the list of performance data at the end of the section. These are the types of data that measure how the Company actually delivers service to its customers, in a quantitative way. However, much of the additional data identified by Mr. Riolo is not performance data at all. It does not measure the performance of the company, but rather focuses on the details of network management and processes that, at some point, may influence performance data. Regulatory reporting should focus on performance data, not data that relates to network planning and administration. As long as carriers perform adequately, how they do so should not be a major Commission concern.

**Q. Please identify the categories of data in the City's proposal that are not actually performance data.**

**A.** Only ten of the City's 39 proposed additional measures are actually performance measures:

- Percent of OOS>24
- Percent of OOS>48
- Percent of installations completed within 5 days
- Percent of installations completed within 7 days
- Percent of installations completed after 10 days
- Number of trouble reports per 100 access lines
- Percent of trouble reports that are repeated
- Percent installation trouble reports
- Percent missed repair appointments with 24 hour notice
- Percent missed installation appointments without 24 hour notice

166

167 **Q. Do you believe the Commission's existing performance data sufficiently track the**  
168 **aspects of service quality that affect customers?**

169

170 A. Yes, I do. I have attached Schedule 2, which shows the decreased number of consumer  
171 commission complaints as Ameritech Illinois' service quality performance has returned  
172 to meeting the Commission's benchmarks. As this shows, customer satisfaction is  
173 strongly correlated to the existing service quality benchmarks.

174

175 **Q. Are there other problems with the City's proposal?**

176

177 A. Yes. Contrary to Mr. Riolo's claim (pp. 27, 29), the additional data are not readily  
178 available. In addition, much of the data the City suggests be provided is confidential,  
179 particularly at the level of specificity suggested by the City (i.e., at a wire center or DAA  
180 level).

181

182 **Q. Please start with the availability of the data. Does Mr. Riolo accurately describe the**  
183 **manner in which Ameritech Illinois manages its installation and Repair and**  
184 **Engineering operations?**

185

186 A. No. Ameritech does not manage Installation and Repair as Mr. Riolo suggests (pp. 7,  
187 27). To the extent that some engineering data, such as the disposition codes in number 1-  
188 11 of City's proposed data are reviewed, that review is done on an exception level. This  
189 means that not all wire centers or DAAs are reviewed, only those that appear to require  
190 action by the Network organization. To the contrary, Ameritech Illinois does not  
191 generally produce or review the data suggested by Mr. Riolo at the wire center and DAA  
192 levels. Instead, performance measures are accumulated at the district level.

193



194 **Q. How are the data managed by the Network organization in Illinois?**

195 A. Information is reviewed in a priority order, on an exception basis. Reports are not  
196 created for all wire centers or DAAs. This is done because of the very large amount of  
197 data to be reviewed. Ameritech Illinois serves approximately seven million access lines,  
198 which would need to be taken into account. Moreover, Ameritech uses its own  
199 proprietary system, not a Bell System legacy system of the sort that Mr Riolo appears to  
200 be familiar with. As a result, his claims of substantial knowledge of Ameritech Illinois'  
201 or other carriers' operations do not appear to be based on first hand information and are  
202 probably mere conjecture. In Ameritech Illinois' case, those claims are simply incorrect.

203  
204 **Q. Would the additional proposed reporting that the City suggests help ensure service**  
205 **quality in actual practice?**

206  
207 A. No. As I stated earlier, the data would be so voluminous and require so much analysis  
208 that it would not help the Commission ensure service quality. Moreover, it does not track  
209 the way in which the Company actually manages service quality performance.

210

211 **Q. Please explain.**

212

213 A. The City is requesting that 39 separate types of data be reported on a quarterly basis at  
214 the wire center or DAA level of disaggregation. This quantity of data points is difficult to  
215 address in a concise fashion, so for the purpose of in this discussion, I will group the data  
216 points into the following groups:

- 217 • Installation and Repair
- 218 • Employee Data
- 219 • Infrastructure Maintenance Disposition
- 220 • Network Planning Reports.

Attached as Schedule 2.3 is a chart that summarizes the problems with the City's proposal. I will discuss those problems in more detail below.

**Q. What COC data fall into the Installation and Repair group?**

A. Items 1-12 in Mr. Riolo's list (p. 14) are in this group.

**Q. Do you have any comments regarding the requested Installation and Repair data?**

A. Yes. The requested data are not internally tracked or produced today at the wire center level. Our Network organization simply does not run its business the way Mr. Riolo suggests. Most of these types of data are currently tracked and reported at the district level, but not at the wire center level. Generally, as I mentioned in my initial testimony, Ameritech Illinois tracks service quality information at the area and district levels. We do not track performance measures below this level of aggregation. We are currently reorganizing the Ameritech Illinois Installation and Repair organization into four main districts, with approximately 25 area manager organizations. As a result, Ameritech Illinois can report service quality information according to the existing 12 districts, as stated in my initial testimony, by the four new districts or by the 25 smaller new geographic areas as they are implemented in 2002. However, wire center or DAA reporting is not available.

**Q. What data are contained in the Employee Data group?**

A. Items 13-18 of Mr. Riolo's list (p. 14) are in this group.

244 **Q. Do you have any comments regarding the Employee Data?**

245 A. Yes. Once again, Ameritech Illinois does not track this data by wire center or DAA, or  
246 produce reports at that level of disaggregation. In fact, Network personnel are not  
247 assigned or managed on that basis, so it is not meaningful to talk about employee data in  
248 terms of wire centers or DAAs.. Moreover, efficiency and force/load data regarding our  
249 employees, at a specific geographic location are clearly not performance data. Finally,  
250 employee data is highly confidential, and Ameritech Illinois should not be required to  
251 disclose this information to our competitors or other third parties.

252

253 **Q. What data are included in your Infrastructure Maintenance Disposition group?**

254 A. Items 1-11 of the second large paragraph in Mr. Riolo's list (pp. 14-15) are in this group.

255

256 **Q. Do you have any comments regarding Infrastructure Maintenance Disposition**  
257 **data?**

258

259 A. Yes, I do. As I stated, Ameritech Illinois does not manage Infrastructure Maintenance in  
260 the way Mr. Riolo suggests (pp. 22-27). The requested data are not tracked or reported  
261 by DAA. Nor is this information performance data. Instead, they are collected for the  
262 purpose of analysis and diagnostics. Also, these data are confidential at the suggested  
263 level of disaggregation.

264

265 **Q. What data are included in your Network Planning Reports group?**

266 A. The Facility Analysis Plan and the Current Plan for each wire center as discussed by Mr.  
267 Riolo (p. 28) are in this group.

268

269 **Q. Do you have any comments regarding the Network Planning Reports?**

270  
271 A. Yes. Once again, Ameritech Illinois does not maintain a separate report per wire center.  
272 Nor does it necessarily produce new reports every six months, as the City's proposal  
273 would require. Additionally, these data are not performance data, but instead are  
274 planning information. Finally, these reports, at the wire center level, would clearly be  
275 confidential and competitively sensitive and should not be disclosed.

276

277 **Q. Please comment on Mr. Riolo's claim that these additional types of data are**  
278 **available at the wire center and DAA level, and only need to be formatted.**

279  
280 A. For most of the additional data, Mr. Riolo is wrong. As Schedule 3 in my testimony  
281 indicates, the majority of the data that the City requests is not currently tracked or  
282 reported. This is probably also true for other carriers.

283

284 **Q. Please describe your confidentiality concerns in more detail.**

285 A. I will provide examples to explain. With respect to Installation and Repair data, a  
286 competitor could focus its network building plans or marketing promotions in wire  
287 centers or very specific geographies using the types of data identified by Mr. Riolo. For  
288 example, if Ameritech Illinois had a temporary force/load issue, a competitor could use  
289 this information to formulate offerings to the specific customers in the area. Similarly,  
290 competitors could avoid serving areas where Ameritech Illinois' service levels are very  
291 strong.

292

293 **Q. Why do you believe employee data is confidential?**

294 A. As I mentioned with Installation and Repair, a competitor could target areas for  
295 competitive advances, based on employee data. Moreover, competitors could target the  
296 employees themselves for recruiting. Additionally, at times, data such as the City's items  
297 13-18 are subject to collective bargaining, which would create additional confidentiality  
298 problems.

299

300 **Q. Do you have concerns about the confidentiality of Network Reports?**

301 A. Yes. Disclosing wire center level information about how a carrier plans to modify or  
302 enhance its infrastructure, through detailed Facility Action Plans or Current Plans, could  
303 provide competitors with extremely sensitive information. Here, a competitor could  
304 modify its marketing or network building plans, based on advance knowledge of another  
305 carrier's plans.

306

307 **Q. Would the City's proposal impose significant costs and burdens on the industry?**

308 A. Yes, it would. Each carrier would likely have to develop customized reports, based on  
309 data that are not currently tracked, and which would be produced solely for regulatory  
310 compliance. The steps in that process would include requirements definition, creation of  
311 program specifications or custom queries, testing, implementation and changes to  
312 methods and procedures. This would be a major undertaking.

313

314 **Q. Do you have any concerns or issues with providing information directly to**  
315 **consumers by service address?**

316

317 **A.** Yes. Mr. Riolo (p. 30, Exhibit JPR 2, proposed Section 730.205) suggests implementing

318 a process that would allow end users to obtain detailed information per service address

319 over a five year period. I disagree with this proposal for several reasons. First, the

320 demand for this information appears to be very limited, judging from the minimal number

321 of requests that we receive for this type of information. Second, the information would

322 be of very limited value, given the changes that may occur in both the network and the

323 type of service. For example, the actual cable pair serving a location may have changed,

324 a voice line may have been conditioned for data, or facilities may have been repaired or

325 replaced. In addition, the proposal raises significant privacy concerns for the former

326 customer at the location. Currently, Ameritech Illinois does not provide service records

327 to anyone other than the customer of record on a given account.

328

329 **Records Retention**

330 **Q. Have any parties to this case proposed changes to Section 730.200, Records?**

331 **A.** Yes. Mr. Riolo (on behalf of the City) has suggested modifying this section of the

332 proposed rule.

333

334 **Q. What is your understanding of his proposal?**

335 A. Mr. Riolo suggests a five-year retention period for much of the data he requests to be  
336 reported, as well as other information that he claims should be retained and available for  
337 review. He argues (p. 30) that:

338 "carriers be required to maintain, for the most recent five year period, incident  
339 records for failure to install service timely, failure to restore service within 24  
340 hours, received installation trouble reports, and failure to keep service  
341 appointments. The record will include data indicating the cause of failure, the  
342 solution indicated by the carrier and other data associated with the incident."  
343

344 **Q. Do you agree?**

345 No I do not. The City's proposal would be a significant extension of the existing  
346 retention period, as well as requiring a substantial amount of additional detail. For  
347 example, it would require the retention of information including VER codes, restoral  
348 description, amount of credit and identification of credit exemption used. Ameritech  
349 Illinois does not track or report the information the City requests, so it is not currently  
350 possible to retain it.

351

352 **Q. Are all the data in the City's proposed Section 730.200 contained in existing**  
353 **Network systems and procedures?**

354  
355 A. No. The additional data are beyond the normal scope of the systems where the relevant  
356 network and account records reside, and would require substantial information systems  
357 work provide. For example, Ameritech Illinois systems do not currently link credit  
358 amounts or exemptions with the repair record itself. Credit amounts would be retained in  
359 our billing systems and not linked back to installation and repair records. Significant

360 work would also be required to tie that information to specific occurrences, which the  
361 City's proposal would also require.

362

363 **Q. Do you agree with the City that retaining that information would not be**  
364 **burdensome?**

365  
366 A. No, I do not. Data retention can be expensive and burdensome. The City's proposal  
367 would substantially increase that expense and burden.

368

369 **Q. Does the current proposed rule provide a reasonable basis for record retention?**

370 A. Yes. I think the current retention guidelines are adequate.

371

372 **Adequacy of Service**

373

374 **Q. Do you have any comments regarding the positions of the parties regarding**  
375 **Adequacy of Service Section 730.500?**

376  
377 A. Yes. Ameritech Illinois supports Staff's proposed rule.

378

379 **Q Do you agree with Mr. Riolo's proposal on this issue (pp. 35-37)?**

380  
381 A. No. I would agree that the steps he identifies may be reasonable measures to make  
382 facilities available, as Mr. Riolo testifies they are. However, Ameritech Illinois already  
383 explores those possibilities whenever an installation order may be delayed for lack of  
384 facilities. Thus, in that regard, Mr. Riolo's proposal adds nothing to what Ameritech  
385 Illinois already does.

386



387 More importantly though, I disagree that detailed reporting of these measures should be  
388 required, as proposed by Mr. Riolo, as a part of Section 730.205. The data are simply not  
389 available at the level of detail suggested by Mr. Riolo. As an example for Outside plant,  
390 code 4s are summarized by 50 pair complement, together with other data elements (e.g.,  
391 fill rates) by sophisticated software to produce a list of cable complements needing  
392 attention. (There are approximately eight million cable compliments in the Ameritech  
393 Illinois network.) A group of 50 Illinois engineering professionals reviews this output  
394 and creates construction plans based on need and payback (e.g., troubles saved). While  
395 the DAA is a data element in these records, analysis by DAA is not available because  
396 compliments without problems are eliminated from the base by the software.

397  
398 **Q. Are there any other comments you have regarding the specifics of the City's**  
399 **testimony?**

400  
401 **A.** Yes. During Mr. Riolo's discussion of additional reporting (p. 15) he refers to the  
402 possibility of layoffs of "employees directly responsible for service performance." He  
403 believes these layoffs could be a factor to pressure the provision of quality service. That  
404 is conjecture, at best, on the part of Mr. Riolo, and the statement is, in fact, not true.  
405 These headcount reductions do not include any technicians, and Ameritech Illinois does  
406 not believe that they will impact service quality.

408 CUB/AG

409 Civil Penalties

410 Q. Please address Ms. TerKeurst's position regarding the potential size of civil  
411 penalties for violating the Commission's service quality rules.

412  
413 A. This is primarily a legal issue, which Ameritech Illinois will address in its briefs.

414 However, as a non-attorney, I do have a few comments.

415

416 Ms. TerKeurst's reliance on the rate reductions and penalties imposed by Ameritech

417 Illinois' Alternative Regulation Plan or the SBC/Ameritech Merger Order is misplaced.

418 The Alternative Regulation Plan and the Merger Order include conditions to which

419 Ameritech agreed in exchange for the approval of the Plan and the merger. Thus, I do

420 not see a connection between those provisions and the civil penalties that the

421 Commission can impose for violating the service quality rules. These seem to me to be

422 two very different issues, so I do not believe that the remedies available under the

423 Alternative Regulation Plan or the Merger Order support the argument that civil penalties

424 for violating the Commission's generally applicable service quality rules can exceed the

425 limits in the statute that she has identified.

426

427

428 Calculation of Measures

429

430

431 Q. Do you have any other issues to address?

432 A. Yes. With respect to Ms. TerKeurst's call for parties to place into the record evidence of

433 their levels of monitoring as of March 2, 2001 (p. 9), I have already done so in my initial

434 testimony, and I have discussed this subject in greater detail above. As I have discussed,

Ameritech Illinois generally tracks and reports service quality measure by district, and it did so previously. It is true that Ameritech Illinois tracks some data separately for residence and business customers and for MSA versus non-MSA areas, as Ms. TerKeurst argues (p. 10), but that does not mean that Ameritech Illinois can disaggregate all of its service quality data by bus/res, by MSA/non MSA or by district. In fact, only the data already provided on that basis can be readily reported in that manner.

**Q. Do you have any other areas of disagreement with CUB/AG's testimony?**

A. Yes. Ms. TerKeurst argues (p. 11) that service quality should be separately reported for residence and business customers to the extent "technically feasible." That suggestion seems go beyond the plain meaning of the Section 13-712 language ("120 days prior"). Ameritech Illinois disagrees with CUB/AG's attempted extension of this requirement.

**Q. Do you have any other areas of disagreement with CUB/AG's testimony?**

A. Yes. I am concerned about Ms. TerKeurst's proposal to modify the Staff proposed rule regarding the calculation of OOS > 24 (p. 17). Ameritech Illinois uses Method A to calculate this statistic as it relates to emergency situations. It is not proper, from a policy perspective, to change a calculation methodology by rule without also analyzing and modifying the benchmark associated with the calculation. Thus, if the calculation methodology is changed, the benchmark must also be changed.

Calculation Method B, supported by Ms. TerKeurst, fails to take into account that troubles caused by emergency situations must still be repaired. To eliminate these troubles from the denominator of the calculation incorrectly implies that those troubles do not exist at all. However, they do. The denominator should reflect the Company's total workload and therefore should continue to include emergency-related troubles.

Finally, I would note that the Commission is currently considering calculation methodologies for certain service quality measures in the review of Ameritech Illinois' Alternative Regulation Plan. To avoid confusion or conflicting orders, the Commission should clearly limit its ruling in this proceeding to the application of Part 730.

**Q. Ms. TerKeurst also suggests that calculation of installation data should be standardized according to either Method B or Method C. Do you agree?**

A. I agree that the calculation installation data should be standardized according to Method B. Method C, which completely ignores emergency situations, is inconsistent with Section 13-712 of the Public Utilities Act and Part 732 of the Commission's rules. Both Section 13-712 and Part 732 exclude emergency situations for purposes of providing credits or alternative service.

**Q. Does this conclude your testimony?**

A. Yes it does.

DOCKET NO. 00-0567  
REVISION OF 83 ILLINOIS ADMINISTRATIVE CODE 730  
CITY OF CHICAGO PROPOSED REPORTING STANDARDS

| PROPOSED QUARTERLY REPORTS   | PERFORMANCE<br>DATA | DATA TRACKED<br>INTERNALLY | DATA PRODUCED<br>TODAY | CONFIDENTIAL |
|--|---------------------|----------------------------|------------------------|--------------|
| <i>On a statewide basis:</i>   |                     |                            |                        |              |
| 1) Average speed of answer time for customer call centers                        | X                   | X                          | X                      |              |
| 2) Average speed of answer time for repair centers                               | X                   | X                          | X                      |              |
| <i>By wire center:</i>   |                     |                            |                        |              |
| 1) % of OOS > 24 hours   | X                   |                            |                        | X            |
| 2) % of OOS > 48 hours   | X                   |                            |                        | X            |
| 3) % of installations completed within 5 days                                    | X                   |                            |                        | X            |
| 4) % of installations completed within 7 days                                    | X                   |                            |                        | X            |
| 5) % of installations completed after 10 days                                    | X                   |                            |                        | X            |
| 6) % of installations not completed within 5 days due to load                    |                     |                            |                        | X            |
| 7) % of installations not completed within 5 days due to facilities              |                     |                            |                        | X            |
| 8) Number of trouble reports per 100 access lines                                | X                   |                            |                        | X            |
| 9) % of trouble reports that are repeated  | X                   |                            |                        | X            |
| 10) % of installation trouble reports  | X                   |                            |                        | X            |
| 11) % of missed repair appointments without 24 hours notice                      | X                   |                            |                        | X            |
| 12) % of missed installation appointments without 24 hours notice                | X                   |                            |                        | X            |
| 13) Average number of installation orders assigned per technician per day        |                     |                            |                        | X            |
| 14) Average number of installation orders completed per technician per day       |                     |                            |                        | X            |
| 15) Average number of repair orders assigned per technician per day              |                     |                            |                        | X            |
| 16) Average number of repair orders completed per technician per day             |                     |                            |                        | X            |
| 17) Average number of overtime hours per week per repair technician              |                     |                            |                        | X            |
| 18) Average number of overtime hours per week per installation technician        |                     |                            |                        | X            |
| <i>with the wire center identified. The carrier shall provide the number of:</i> |                     |                            |                        |              |
| 1) Line and Station Transfer (LST)   |                     |                            |                        | X            |
| 2) Wired Out of Limits (WOL)   |                     |                            |                        | X            |
| 3) Break Connect-Through (BCT)   |                     |                            |                        | X            |
| 4) Clear Defective Pair (CDP)  |                     |                            |                        | X            |
| 5) Break Permanent connection (BPC)  |                     |                            |                        | X            |
| 6) Customer Interconnection Record (CIR)   |                     |                            |                        | X            |
| 7) Referred to Engineering (RE)  |                     |                            |                        | X            |
| 8) Re-terminated Connection (RTC)  |                     |                            |                        | X            |
| 9) Found Cable Troubles  |                     |                            |                        |              |
| a) 1 - 6   |                     |                            |                        | X            |
| b) 7A (Splicing)   |                     |                            |                        | X            |
| c) 7B (Terminating)  |                     |                            |                        | X            |
| d) 8 - 9 (Core Troubles)   |                     |                            |                        | X            |
| 10) Assignment Changes   |                     |                            |                        | X            |

| PROPOSED QUARTERLY REPORTS                               | PERFORMANCE<br>DATA | DATA TRACKED<br>INTERNALLY | DATA PRODUCED<br>TODAY | CONFIDENTIAL |
|--|---------------------|----------------------------|------------------------|--------------|
| a) Service Order Defective (SOD)                         |                     |                            |                        | X            |
| b) Other Defective (ODF)                                 |                     |                            |                        | X            |
| c) Other assignment Change (OAC)                         |                     |                            |                        | X            |
| 11) Disposition codes                                    |                     |                            |                        |              |
| a) Initial, Subsequent and Total Code 3's (Wire)         |                     |                            |                        | X            |
| b) Initial, Subsequent and Total Code 4 (OSP)            |                     |                            |                        | X            |
| c) Initial, Subsequent and Total Code 5 (Central Office) |                     |                            |                        | X            |
| d) Initial, Subsequent and Total Code 7 (Test OK)        |                     |                            |                        | X            |
| e) Initial, Subsequent and Total Code 8 (Found OK In)    |                     |                            |                        | X            |
| f) Initial, Subsequent and Total Code 9 (Found OK Out)   |                     |                            |                        | X            |
| PROPOSED ANNUAL REPORTS TO BE FILED                      |                     |                            |                        |              |
| Facility Analysis Plan (for each wire center)            |                     |                            |                        | X            |
| Current Plan (for each wire center)                      |                     |                            |                        | X            |

Consumer Complaints Q1

CONSUMER COMPLAINTS  
JAN. - DEC. 2000

|                                 | JAN | FEB | MAR | APR | MAY | JUN | JUL | AUG | SEP | OCT | NOV | DEC | YTD |
|---------------------------------|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|
| MISSED APPOINTMENT-INSTALLATION | 0   | 3   | 4   | 6   | 12  | 44  | 85  | 124 | 63  | 27  | 2   | 0   | 370 |
| MISSED APPOINTMENT-REPAIR       | 1   | 0   | 0   | 0   | 2   | 11  | 3   | 19  | 20  | 8   | 1   | 0   | 65  |
| LENGTH OF TIME TO REPAIR        | 1   | 0   | 2   | 5   | 9   | 8   | 10  | 23  | 128 | 71  | 4   | 5   | 266 |
| INSTALLATION INTERVAL           | 1   | 9   | 5   | 4   | 7   | 15  | 34  | 57  | 49  | 26  | 0   | 0   | 207 |

CONSUMER COMPLAINTS  
JAN. - OCT. 2001

|                                 | JAN | FEB | MAR | APR | MAY | JUN | JUL | AUG | SEP | OCT | NOV | DEC |
|---------------------------------|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|
| MISSED APPOINTMENT-INSTALLATION | 2   | 6   | 14  | 8   | 8   | 11  | 6   | 12  | 5   | 15  |     |     |
| MISSED APPOINTMENT-REPAIR       | 4   | 2   | 2   | 3   | 1   | 1   | 7   | 11  | 6   | 5   |     |     |
| LENGTH OF TIME TO REPAIR        | 10  | 16  | 9   | 6   | 5   | 3   | 13  | 21  | 9   | 7   |     |     |
| INSTALLATION INTERVAL           | 4   | 1   | 3   | 2   | 2   | 2   | 1   | 3   | 0   | 4   |     |     |



[illegible]